

# Exhibit 24

6-13-2005

[REDACTED] v. Arpaio, et al.

State of South Carolina )  
 ) In the Court of Common Pleas  
County of Charleston )

[REDACTED], )  
 )  
 )  
Plaintiff, )

vs. )

Michael Arpaio and The  
Citadel, )

Defendants. )

[REDACTED]  
Deposition

)  
 ) of  
 )  
 ) [REDACTED]

Deposition of [REDACTED] taken before  
Stephen K. Tackett, a notary public in and for the State  
of South Carolina, commencing at the hour of 9:12 a.m.,  
Monday, June 13, 2005, at the office of Law Offices of  
J. Edward, Bell, III, LLC, 232 King Street, Georgetown,  
South Carolina.

Reported by:  
Stephen K. Tackett

803.749.8100

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- 1 **campus before then? You mentioned you and [REDACTED]**  
 2 **in 1998.**  
 3 A '98, we did. Me and [REDACTED] did in '97.  
 4 Q **And all of that took place where?**  
 5 A In Arpaio's room.  
 6 Q **Okay, did anybody see you drinking other than**  
 7 **Arpaio?**  
 8 A In '97? No. I don't -- I don't think so. Maybe  
 9 some other counselors. I don't -- I'm not  
 10 positive, but other -- in '98, Rob Lyons for sure  
 11 saw us. Definitely saw us getting drunk.  
 12 Q **You didn't -- I think you said you didn't ever see**  
 13 **alcohol in any other counselor rooms in 1998.**  
 14 A Yeah, I don't -- I don't remember.  
 15 Q **Okay, and only -- so the only alcohol was actually**  
 16 **in Arpaio's --**  
 17 A That I know of.  
 18 Q **-- okay, was in his bag which you said you put on -**  
 19 **- he put on the -- on the chest?**  
 20 A He put -- he put his bag inside the closet at the  
 21 bottom where -- like at the bottom of his closet  
 22 next to his shoes, he put it on top of his -- his -  
 23 - his chest of drawers, on the floor next to his  
 24 chest of drawers.  
 25 Q **Okay, and it was open all the time?**

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- 1 A It was always -- it was always open.  
 2 Q **And the bottles were visible?**  
 3 A Yeah, the bottles were clearly visible.  
 4 Q **Okay, when --**  
 5 A Sometimes it would -- a lot of it was because of us  
 6 because we'd be in there drinking it and we would  
 7 just leave it there.  
 8 Q **This is in '98?**  
 9 A Yes.  
 10 Q **When you said chest of drawers, there's a -- you**  
 11 **described earlier this metal closet --**  
 12 A That's not the chest of drawer.  
 13 Q **Okay.**  
 14 A The chest of drawers had drawers. It was a metal  
 15 with wood paneling on top.  
 16 Q **Four-drawer thing?**  
 17 A (Nods head up and down.)  
 18 Q **Okay, and that's where he would put it on top of**  
 19 **that?**  
 20 A Yes.  
 21 Q **All right.**  
 22 MR. BRANDENBURG: All right. Until we meet  
 23 again.  
 24 (Whereupon, there being no further  
 25 questions, the deposition was

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- 1 concluded at 7:03 p.m.)  
 2 FURTHER DEPONENT SAITH NOT.  
 3 Signing waived.

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STATE OF SOUTH CAROLINA )  
 ) CERTIFICATE  
 COUNTY OF LEXINGTON )

Be it known that I took the foregoing  
 deposition of [REDACTED];  
 That I was then and there a notary public in  
 and for the State of South Carolina-at-large;

That by virtue thereof I was duly authorized  
 to administer an oath;

That the witness was by me first duly sworn to  
 testify the truth, the whole truth, and nothing but the  
 truth, concerning the matter in controversy aforesaid;

The foregoing transcript of 377 typewritten  
 pages represents a true, accurate and complete  
 transcription of the testimony so given at the time and  
 place aforesaid to the best of my skill and ability;

That I am not related to nor an employee of  
 any of the parties hereto, nor a relative or employee of  
 any attorney or counsel employed by the parties hereto,  
 nor interested in the outcome of this action.

Witness my hand and seal this 23th day of  
 June, 2005.

Stephen K. Tackett

Notary public for South Carolina  
 My commission expires March 15, 2014.

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 months from the date of proceeding, or until transcript  
 has been signed in cases where signature is not waived.

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